DIRECTIVE



WELFARE-TO-WORK

Number: WD99-11

Date: November 15, 1999

69:75:va:3258

TO: SERVICE DELIVERY AREA ADMINISTRATORS

PRIVATE INDUSTRY COUNCIL CHAIRPERSONS WELFARE-TO-WORK 15 PERCENT SUBGRANTEES DOL WELFARE-TO-WORK 25 PERCENT SUBGRANTEES

COUNTY WELFARE DEPARTMENT DIRECTORS
CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

EDD EXECUTIVE STAFF

WORKFORCE DEVELOPMENT BRANCH STAFF

SUBJECT: CASH MANAGEMENT FOR 15 PERCENT GRANTEES

EXECUTIVE SUMMARY:

Purpose:

This directive provides guidance on cash management procedures for the federal Welfare-to-Work (WtW) 15 Percent grant program.

Scope:

This directive applies to all subgrantees of WtW 15 Percent grant funds, Governor's Grants, and Regional Collaboratives.

Effective Date:

This directive is effective upon release.

REFERENCES:

- Title 20 Code of Federal Regulations (CFR) 645.230, fiscal and administrative rules for WtW federal funds
- Title 29 CFR Part 95.22, Payment
- Title 29 CFR Part 97.21, Standards for Financial Management Systems
- Treasury Circular 1075 (Title 31 CFR Part 205)
- California Unemployment Insurance Code (CUIC) Sections 10000-10005
- WtW Directive WD99-3, Subject: Benchmarks and Subgrant Availability— WtW 15 Percent (February 17, 1999)

STATE-IMPOSED REQUIREMENTS:

This document contains State-imposed requirements in **bold**, **italic** type.

FILING INSTRUCTIONS:

This directive supersedes WtW Directive WD99-2, dated February 17, 1999, and finalizes Draft Directive WDD-13 issued for comment on October 14, 1999. Retain this directive until further notice.

BACKGROUND:

The WtW Grants Interim Rule Section 645.230(a) identifies the applicable federal fiscal and administrative rules. For uniform fiscal and administrative requirements, the Department of Labor (DOL) regulations Title 29 CFR Part 97 apply to state, local, and Indian tribal government organizations. The Office of Management and Budget (OMB) Circular A-110, which codified Title 29 CFR Part 95, governs institutions of higher education, hospitals, and other nonprofit organizations. These regulations require cash management in accordance with Treasury regulations, Title 31 CFR Part 205, that state the methods and procedures for payment shall minimize the time between the transfer and disbursement of funds.

This directive differs from the previous directive on this topic, WtW Directive WD99-2. The changes include specific instructions for returning excess cash and revised forms for providing the necessary information to receive cash and for requesting cash.

POLICY AND PROCEDURES:

Definitions:

Immediate Cash Need means the cash needed for the next three working days to cover drafts issued or payments due within that time.

Policy:

These policies and procedures are established to comply with federal requirements and the CUIC. To ensure that the need for funds is based on program operation, each subgrantee developed a list of benchmarks identified in Exhibit II of the subgrant. On reaching a specified benchmark, funds are available for release based on immediate cash need. (See WtW Directive WD99-3, Benchmarks and Subgrant Availability.) Subgrantees must identify the amount of cash needed to cover drafts issued or payments due within the next three working days. Cash requests should cover only the identified needs. Subgrantees shall not request more cash than is necessary to cover these expenses. State and federal monitoring guides provide for review of cash requests and disbursements for compliance.

Only subgrantees with executed contracts may receive cash. Failure to meet reporting requirements may delay or suspend the release of cash. Identification of excess cash on hand may cause the organization to be placed on a reimbursement basis.

State and federal holidays are not working days for the processing of cash requests. Holidays that fall on Sunday are observed on the following Monday. The list of state and federal holidays, as well as the date or day of the week it is observed, is as follows:

HOLIDAY	DATE
New Year's Day	January 1
Martin Luther King Day	3rd Monday in January

HOLIDAY	DATE
Abraham Lincoln's Birthday	February 12
President's Day	3rd Monday in February
Memorial Day	Last Monday in May
Independence Day	July 4
Labor Day	1st Monday in September
Columbus Day	2nd Monday in October
Veterans Day	November 11
Thanksgiving Day	Fourth Thursday in November
Thanksgiving Holiday	Friday after Thanksgiving
Christmas Eve	December 24 limited hours
Christmas Day	December 25
New Year's Eve	December 31 limited hours

Procedures:

Methods for Receiving Cash

The Employment Development Department (EDD) payment system provides four options by which subgrantees may receive WtW funds:

- Inter-branch deposits (for subgrantees that have accounts with the Bank of America); Fiscal Programs Division requires deposit slips from your bank account in order to process the cash requests. Please supply a pad of deposit slips with your Information Request Form and additional deposit slips when the supply is exhausted.
- 2. Inter-bank wire transfers (for subgrantees that have accounts with other financial institutions);
- 3. Mail delivery of State warrants; and
- 4. Direct pick-up of State warrants by subgrantees.

The subgrantee must complete the attached Information Request Form identifying its choice.

Inter-branch deposits and inter-bank wire transfers are the fastest. The other two options allow subgrantees to deposit funds themselves; however, providing State warrants is a slower process.

Requesting Cash

- 1. On completion of a benchmark, the subgrantee will complete and submit the form FWD99-3B1, Welfare-to-Work Benchmarks and Subgrant Availability Report, to its program manager.
- 2. Approval by the program manager permits access to funds for immediate cash needs.
- 3. When the subgrantee forecasts a need for cash within the next three working days, the subgrantee completes and submits the attached Manual JTA Cash Request Form to the program manager. To expedite the process, the form

should be submitted via fax transmittal to (916) 654-7921, for Governor's Grantees, and (916) 653-2467 for Regional Collaboratives. The requested cash will be deposited in the subgrantee's bank via electronic transfer within three working days. Cash requested by inter-branch deposit or inter-bank wire transfer should be received within three working days from the day of request. If cash is not received by the fifth working day, please contact your program manager.

4. Additional cash may be requested only after previously requested cash is liquidated and there is a need for additional cash to meet immediate needs.

Excess Cash

- 1. Subgrantees must take adequate measures to ensure that cash requested meets needs. After the first request for cash, the subgrantee should verify that the cash requested did not exceed the need. If the cash exceeded the need, subgrantees must reevaluate their forecasting process and make necessary corrections. After the second request for cash, the subgrantee should verify that the cash requested did not exceed the need. Subgrantees who continually have excess cash on hand may be required to change to a reimbursement method of payment.
- 2. Any excess cash on hand must be returned. To return excess cash, submit a check for the excess cash accompanied by a letter showing the subgrantee's name, subgrant number, the program year, the grant code, and the amount to the following address:

Attention: Cash Control Unit Fiscal Programs Division, MIC 70 Employment Development Department P.O. Box 826880 Sacramento, CA 94280-0001

A copy of the letter must be sent to your assigned program manager.

Interest

Any interest earned on WtW funds shall be remitted to the federal government via the State following the procedures in "Excess Cash" *item 2*. The federal government establishes these requirements. State, local, and Indian governmental grantees or subgrantees may keep interest amounts up to \$100 per year for administrative expenses; any excess must be returned quarterly. For institutions of higher education, hospitals, other nonprofit organizations and commercial organizations, excluding state universities and hospitals, specific banking requirements apply, as stated in Title 29 CFR Part 95.22:

- (k) Recipients shall maintain advances of federal funds in interest bearing accounts, unless paragraph (k)(1), (k)(2), or (k)(3) of this section apply.
 - (1) The recipient receives less than \$120,000 in federal awards per year.

- (2) The best reasonably available interest bearing account would not be expected to earn interest in excess of \$250 per year on federal cash balances.
- (3) The depository would require an average or minimum balance so high that it would not be feasible within the expected federal and non-Federal cash resources.

If interest is earned, the recipient may retain amounts up to \$250 per year for administrative expenses.

ACTION:

Bring this directive to the attention of all affected staff.

INQUIRIES:

Please direct inquiries about this directive to your program manager at (916) 654-7799.

/S/ BILL BURKE
Assistant Deputy Director

Attachments

JOB TRAINING AUTOMATION (JTA) SYSTEM INFORMATION REQUEST FORM

Fiscal Programs Division, MIC 70 **Employment Development Department** P.O. Box 826880 Sacramento, CA 94280-0001 From: Subgrant Recipient: Person responsible for cash request security password: Mailing address: 1. The contact personnel who can answer questions regarding the cash request(s) is/are: Name Telephone Number 2. The names of personnel authorized to enter or request cash through the JTA system from the State or by faxing to the Cash Desk at (916) 654-7921 are as follows: Name Telephone Number Signature 3. Please indicate the method of funding that you prefer to use by checking one of the following: a. Inter-Branch Deposit (See 4 and 7 below) **DEPOSIT SLIPS REQUIRED** b. Wire Transfer (See 4 and 7 below) c. U.S. Mail Delivery (See 5 and 7 below) d. Direct Pick-Up (See 6 and 7 below) Inter-Branch Deposits are for any account with Bank of America.

To:

Attention: Lynda Lawson

Cash Control Unit

JOB TRAINING AUTOMATION (JTA) SYSTEM INFORMATION REQUEST FORM (continued)

4.	For inter-branch deposits or elect complete this section.	ronic wire transfers ("3	a.a." and "3.b." above),	
	Please have all funds related to the bank account:	ne above subgrant depo	osited into the following	
	Bank Name:	Bank Telephone No.:		
	Address:			
	Bank Account Name:			
	Branch Number:	Account Numbe	er:	
5.	For U.S. Mail delivery of State warr the address is different than that pro	,	•	
	Please send all related warrants to t	he above subgrant to the	e following address:	
6.	For direct pick-up of State warrants ("3.d." above), complete this section.			
	Please release all funds related to the alternate.	ne above subgrant to the	following person and/or	
	Name	Telephone Number	Signature	
7.	Persons authorized to enter expend	iture reporting informatio	n into the JTA system:	
	Name	Telephone Number	Signature	
8.	Signature of Authorizing Representa	ative:		
			Date:	
Or	ne JTA System Information Request F	Form is required for each	office.	

FWD99-11A2

MANUAL JOB TRAINING AUTOMATION CASH REQUEST FORM ONLY FOR WELFARE-TO-WORK 15 PERCENT CASH REQUESTS

To: Welfare-to-Work Program, MIC 69-1 Employment Development Department P.O. Box 826880 Sacramento, CA 94280-0001

Subgrant Recipient: Subgrant Number:

Date of Request:

EDD USE ONLY

П

W

Telephone: (916) 654-7799 Governor's Grantees Fax: (916) 654-7921 Regional Collaboratives Fax: (916) 653-2467

0				
С				
R				
Program Title	Grant Code	Cash Requested to Date	Cash Disbursed to Date	Cash Request Amount
Total				
cash is provided deposited into ou	for the amounts ur account on or		understand the funds	will be available or
		ion on this form must b nt Department by 1:30 p	•	
and that, to the accordance with	best of my know the current bu	appointed representatively whedge, the above required get provisions, and decessary to meet our in	uest represents our loes not violate the S	best estimate, is in state's policy of not
Name Signature			_ Date	
Program Manag	_ Date			

INSTRUCTIONS

for the

MANUAL JOB TRAINING AUTOMATION CASH REQUEST FORM

only for WELFARE-TO-WORK 15 PERCENT CASH REQUESTS

Subgrant Recipient: Please enter the name of the subgrantee as indicated on

the executed subgrant agreement along with the

three-digit alpha subgrantee code.

Subgrant Number: Enter the subgrant number. The subgrant number is

referred to as the registration number located in the right-hand corner of the executed subgrant agreement.

Date of Request: Enter the <u>actual</u> date that the cash is being requested.

Program Title: Enter the correct program title for the grant stipulated on

the executed subgrant agreement (i.e., Welfare-to-Work

[WtW]).

Grant Code: Enter the correct grant code. The grant code is located

on the Funding Detail Sheet of the executed subgrant

agreement (800, 805, or 806).

Cash Requested to Date: Enter the amount of cash requested *prior* to the current

request.

Cash Disbursed to Date: Enter the amount of cash disbursed (i.e., checks written)

to date from the entity's bank account.

Cash Request Amount: Enter the amount of the cash currently being requested.

To guarantee same day processing, please submit the completed and signed Manual Job Training Automation Cash Request Form to EDD by 1:30 p.m.